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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 BORIS ANGUELOV AVRAMSKI,)
16 Plaintiff,) Case No. 2:12-cv-02167
17 v.) UNOPPOSED MOTION FOR 30 DAY
18 UNITED STATES, et al.,) EXTENSION OF TIME TO ANSWER,
19 Respondents.) PLEAD, OR OTHERWISE RESPOND
20) TO PLAINTIFF'S COMPLAINT FOR
21) WRIT OF MANDAMUS AND
22) DECLARATORY RELIEF
23)
24)
25)
26)

27 The United States of America by and through Daniel G.
28 Bogden, United States Attorney for the District of Nevada, and
29 Carlos A. Gonzalez, Assistant United States Attorney, without
30 waiving any defenses that may be available in this case, for the
31 reasons set forth below, the Defendants move this Court for an
32 unopposed 30-day extension of time, from March 11, 2013, to and
33 including April 10, 2013, by which to answer, plead, or otherwise
34 respond to Boris Anguelov Avramski's ("Plaintiff") Petition for
35 Writ of Mandamus and Declaratory Relief ("Complaint").
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1 Plaintiff has petitioned the Court, *inter alia*, for a writ
2 of mandamus compelling the Defendants to grant his naturalization
3 application. Defendants have been diligently preparing to
4 answer, plead, or otherwise respond to Plaintiff's Complaint by
5 March 11, 2013. In preparation to answer, plead, or otherwise
6 respond, Defendants have been coordinating with agency counsel,
7 gathering documents, and determining their defenses.
8 Simultaneously, the parties to this action are exploring avenues
9 to resolve this litigation.

10 As the parties seek to resolve the dispute giving rise to
11 this litigation, counsel for Defendants requests an additional 30
12 days to answer, plead, or otherwise respond to Plaintiff's
13 Complaint. Should the parties not be able to resolve this
14 matter, Defendants expect to be in position to answer, plead, or
15 otherwise respond to the Plaintiff's Complaint by April 10, 2013.

16 Counsel for the Defendants has conferred with counsel for
17 Plaintiff, Peter L. Ashman, who has no opposition to this request
18 for an extension of time.

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2 Accordingly, Defendants request an extension of time, from
3 March 11, 2013, to and including April 10, 2013, by which to
4 answer, plead, or otherwise respond to Plaintiff's Complaint.

5 Dated: March 11, 2013

6 Respectfully submitted,

7 DANIEL G. BOGDEN
United States Attorney

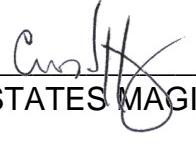
8 //s// Carlos A. Gonzalez
9 Assistant United States Attorney

10
11 OF COUNSEL:

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21 Counsel for Defendants

22
23 IT IS SO ORDERED.

24 DATED: March 12, 2013.
25

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UNITED STATES MAGISTRATE JUDGE